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*Attorneys for Defendants*  
*C. R. Bard, Inc. and*  
*Bard Peripheral Vascular, Inc.*

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF ARIZONA**

IN RE: Bard IVC Filters Products Liability  
 Litigation,

No. 2:15-MD-02641-DGC

**DEFENDANTS' NOTICE OF  
 LODGING UNDER SEAL  
 CERTAIN EXHIBITS IN  
 SUPPORT OF BARD'S  
 RESPONSE IN OPPOSITION TO  
 PLAINTIFFS' MOTION IN  
 LIMINE NO. 1: INTERVENING  
 CAUSE OF INJURY**

This Document Relates to:  
 Debra Tinlin, et al. v. C. R. Bard, Inc., et al.  
 CV-16-00263-PHX-DGC

Defendants C. R. Bard, Inc. and Bard Peripheral Vascular, Inc. (collectively "Bard"), pursuant to the Stipulated Protective Order (Doc. 269), Federal Rule of Civil Procedure 26(c)(1)(G), and Local Civil Rule 5.6 file this notice of lodging under seal certain exhibits attached in support of Bard's Response in Opposition to Plaintiffs' Motion *in Limine* No. 1: Intervening Cause of Injury. These exhibits contain certain Plaintiffs'

1 personal healthcare information that is protected under HIPAA and confidential under the  
 2 Stipulated Protective Order. Defendants have notified Plaintiffs of their intent to file this  
 3 Notice of Lodging. Because the documents lodged under seal only relate to Plaintiffs'  
 4 personal healthcare information, Defendants note that it is Plaintiffs' burden to file a  
 5 motion to seal. A list of the Exhibits sought to be sealed are attached hereto as Exhibit A.

6 RESPECTFULLY SUBMITTED this 12th day of April, 2019.

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 Bard Peripheral Vascular, Inc.**

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**EXHIBIT A**

**DOCUMENTS PROPOSED TO BE FILED UNDER SEAL**

Defendants request they be permitted to file under seal the following documents:

Exhibit A: Expert Report of Dr. Owens

Exhibit B: Excerpts from January 7, 2019 Deposition of Dr. Hurst